

1 Scott E. Gizer, Esq., Nevada Bar No. 12216  
2 *sgizer@earlysullivan.com*  
3 Sophia S. Lau, Esq., Nevada Bar No. 13365  
4 *slau@earlysullivan.com*  
5 EARLY SULLIVAN WRIGHT  
6 GIZER & McRAE LLP  
7 8716 Spanish Ridge Avenue, Suite 105  
8 Las Vegas, Nevada 89148  
9 Telephone: (702) 331-7593  
10 Facsimile: (702) 331-1652

11 Kevin S. Sinclair, NV Bar No. 12277  
12 *ksinclair@sinclairbraun.com*  
13 SINCLAIR BRAUN LLP  
14 16501 Ventura Blvd, Suite 400  
15 Encino, California 91436  
16 Telephone: (213) 429-6100  
17 Facsimile: (213) 429-6101

18 Attorneys for Defendants  
19 FIDELITY NATIONAL TITLE INSURANCE COMPANY and  
20 CHICAGO TITLE INSURANCE COMPANY

21 DESIGNATED LOCAL COUNSEL FOR SERVICE OF  
22 PROCESS ON SINCLAIR BRAUN LLP PER L.R. IA 11-1(b)

23 Gary L. Compton, State Bar No. 1652  
24 2950 E. Flamingo Road, Suite L  
25 Las Vegas, Nevada 89121

26 **UNITED STATES DISTRICT COURT**

27 **DISTRICT OF NEVADA**

28 BANK OF AMERICA, N.A.,

Plaintiff,

vs.

FIDELITY NATIONAL TITLE GROUP,  
INC., ET AL.,

Defendants.

Case No.: 2:21-CV-00971-GMN-EJY

**STIPULATION TO EXTEND  
DEADLINE TO RESPOND TO  
REMAND MOTION (ECF NO. 7) AND  
MOTION FOR FEES (ECF NO. 8)**

Plaintiff Bank of America, N.A. ("BANA") and defendants Fidelity National Title Insurance Company ("FNTIC") and Chicago Title Insurance Company ("CTIC"), by and through their undersigned counsel, stipulate and agree as follows, subject to the approval of the Court:

1. On May 19, 2021, BANA filed its Complaint in the Eighth Judicial District Court,

Case No. A-21-834935-C [ECF No. 1-1];

2. On May 20, 2021, FNTIC and CTIC filed a Petition for Removal to this Court [ECF No. 1];

3. On June 21, 2021, BANA filed a Motion for Remand [ECF No. 7] and Motion for Costs and Fees [ECF No. 8];

4. FNTIC's and CTIC's current deadline to respond to these motions is July 6, 2021;

5. FNTIC and CTIC are requesting a 30-day extension of their deadline to respond to these motions, through and including August 5, 2021;

6. BANA does not oppose the requested extension;

7. This is the first request for an extension which is made in good faith and not for purposes of delay;

**IT IS SO STIPULATED** that FNTIC's and CTIC's deadline to respond to BANA's Motion for Remand [ECF No. 7] and Motion for Costs and Fees [ECF No. 8] is hereby extended through and including August 5, 2021.

Dated: July 1, 2021

WRIGHT, FINLAY & ZAK

By: /s/-Darren T. Brenner  
DARREN T. BRENNER  
Attorneys for Plaintiff  
BANK OF AMERICA, N.A.

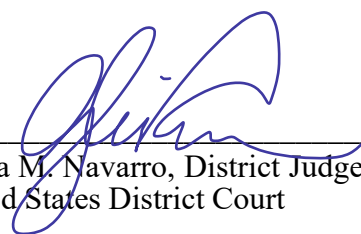
Dated: July 1, 2021

SINCLAIR BRAUN LLP

By: /s/-Kevin S. Sinclair  
KEVIN S. SINCLAIR  
Attorneys for Defendants  
FIDELITY NATIONAL TITLE INSURANCE  
COMPANY and CHICAGO TITLE  
INSURANCE COMPANY

**IT IS SO ORDERED *nunc pro tunc*.**

Dated this 7 day of July, 2021.

  
\_\_\_\_\_  
Gloria M. Navarro, District Judge  
United States District Court